



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

THOMAS LAI  
Senior Counsel  
E-mail: tlai@law.nyc.gov  
Phone: (212) 356-2336  
Fax: (212) 356-3509

April 19, 2023

**VIA ECF**

Honorable Denis L. Cote  
District Court Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Kadeen Walters v. City of New York, et al.* 21-CV-07378 (DLC)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for the defendants in the above referenced matter. As Your Honor may recall, on February 22, 2023, the parties notified the Court that on February 16, 2023, Plaintiff accepted the City's Rule 68 Offer of Judgment; thereafter, and following the parties' request for additional time to attempt to resolve attorney's fees, Your Honor Ordered the parties to file any motions by April 21, 2023. *ECF Nos. 42, 43.*

For the reasons set forth below, I write with the consent of Plaintiff's counsel, Jeanne Mirer, to respectfully request a thirty-day enlargement of the time, from April 21, 2023 to May 19, 2023, for Plaintiff to file any motion for attorneys' fees, if necessary. The reason for this request is, for a portion of the month of March, the undersigned encountered unexpected personal family matters, which required my immediate attention for several weeks. It is the hope of counsel for the parties to resolve the remaining issue in this case, attorney fees, with the additional time without the need for motion practice.

Accordingly, for the reasons set forth herein, defendants respectfully request a 30-day extension of time, until May 19, 2023, for Plaintiff to file any motion for attorneys' fees and for the Court to endorse the following proposed briefing schedule:

- Date for any motion to be filed: May 19, 2023;
- Opposition due: June 2, 2023; and

*Granted. There shall  
be no further  
extension.  
Dennis Cote  
4/20/23*

- Reply due: June 9, 2023.

Thank you for your consideration of the instant application.

Respectfully submitted,

Thomas Lai /s/

Thomas Lai

Senior Counsel

Special Federal Litigation Division